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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the Transport of Dangerous Goods
(Fourteenth session, Geneva, 8-18 December 1997, agenda item 4 (b))

DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Physical hazards

Joint ILO/UN CETDG Working Group on harmonized classification criteria for flammability and reactivity

Transmitted by the European Confederation of Paint, Printing Ink and Artists' Colours Manufacturers' Association (CEPE)

Definition and criteria for flammable liquids

Introduction

In English the definition of the word 'flammable' is ***readily combustible.***

In the report on the work of the joint ILO/UN working groups on harmonized classification criteria for flammability and reactivity contained in ST/SG/AC.10/23/Add.4, the criteria for the classification of flammable liquids refers only to flash point and boiling point.

Part III, sub-section 32.5.2, of the Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria contains the following:

"32.5.2 ***Test L.2: Sustained combustibility test***

32.5.1 *Introduction*

This test is used to determine if a substance sustains combustion when heated under the test conditions and exposed to a flame."

The proposed criteria for harmonisation, which are based solely on criteria relating to flash point and boiling point, are only indicative of the potential to meet the definition of having the intrinsic properties of being flammable. The combustibility test 'L.2' needs to be included in order to properly determine the intrinsic property (hazard) of being flammable.

Proposal

Test L.2: Sustained combustibility test, as contained in Part III, sub-section 32.5.2, of the Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria should be included in the harmonised criteria for flammable liquids.

Justification

The property of being ***readily combustible (flammable)*** is an intrinsic property of hazard and not a property associated with risk, and is therefore a prerequisite in the definition of being flammable.

There are many products, including domestic washing-up liquids, which , when tested by the present proposal for criteria, will exhibit a flash-point but which do not have the property of being readily combustible (flammable).